

# IMPP Newsletter



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## KEY DATES

### Monthly Reports

15<sup>th</sup>-Self-Monitoring Reports Due  
(Ex. September SMR due October 15<sup>th</sup>)

### Semi-Annual Reports

June 1<sup>st</sup> – Period 1 Semi-Annual Report Due.

- Sampling Window is from November 1st – April 30th

December 1<sup>st</sup> – Period 2 Semi-Annual Report Due

- Sampling Window is from May 1st – November 30<sup>th</sup>.

### Annual Reports

June 30<sup>th</sup>- Flowmeter Calibration Reports due

## CITY OF MEMPHIS IMPP INFORMATION

Largest Pretreatment Program in TN (based on number of Industries)

Largest Pretreatment Program in EPA Region 4 (AL, FL, GA, KY, MS, NC, SC, TN)

18<sup>th</sup> Largest Pretreatment Program in the Nation (out of ~1,500)

2020- IMPP collected and analyzed ~7,000 samples

- Industries collected and analyzed ~97,000 samples

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# SPOTLIGHT

## City of Memphis Public Works Receives Award

The City of Memphis was presented the Project Excellence Award at the KY/TN Water Professionals 2021 Conference in Chattanooga, TN for Its Smart Sensor Monitoring Network.



## New Employees

Scott Richards joined our Team in June 2021 as the Environmental Engineer. He attended the University of Memphis where he earned a B.S and M.S Degree in Civil Engineering. Scott has an extensive background in environmental engineering, consulting, water resources management, design and remediation.

Caitlin De Bellis joined our Team in August 2021 as an Environmental Project Coordinator. She attended Paul Smith's College in New York where she earned a B.S degree. in Environmental Sciences. She currently attends Arkansas State University and is in the final stage of completing a M.S. Degree in Biology.

Our Team is excited to have Scott and Caitlin and we anticipate great things from our newest members. WELCOME ABOARD!!!!

## Program Projects

### Local Limit Evaluation

Federal and State regulations requires each Publicly Owned Treatment Works (POTW) Pretreatment Program to develop and enforce local limits. The City of Memphis evaluates its local limits as necessary to ensure renewed and continued compliance with its NPDES permit and sludge use or disposal practices.

The City of Memphis performed its Local Limits sampling events in December 2020 and has partnered with Brown & Caldwell to assist with evaluating and developing local limits. An updated Local Limits parameter list will be available in 2021.

### Industrial Waste Survey

Federal and State regulations requires the City of Memphis to conduct an Industrial Waste Survey (IWS). The purpose of the IWS is to identify and locate all possible industrial users, identify the character and volume of pollutants, and notify industrial users of applicable Pretreatment Standards. The City of Memphis and its partners are working diligently to identify any unpermitted Users that have the potential to adversely impact the POTW.



## COMPLIANCE TIPS

- Ensure all reports are complete and submitted by due dates.
- Ensure all reports are signed by an Authorized Representative.
- Include the proper certification statement (i.e., "I certify under penalty of law...") with all submittals.
- Submit wet ink original reports in addition to any electronic submittals.
- Conduct sampling events at the beginning of each month if your IWDP includes monthly average limits.
- Calibrate pH meter(s) frequently.
- Ensure pH buffer solutions are not expired.
- Calibrate flow meter(s) frequently (at least annually)
- Ensure all detection limits for parameter compliance are  $\leq$  the permit limits.
- Conduct multiple semi-annual sampling events within each window to avoid status of Significant Noncompliance (SNC).

## Q & A



1. Where should the composite sampler tubing be placed when sampling from flumes, spillway boxes, or pits?

*Ans: Tubing should be placed in the middle of the stream flow if possible, since it's common for debris to build up on the bottom of these sampling locations.*

2. What volume for each sample aliquot must be collected when using automatic samplers?

*Ans: Automatic samplers must be set to collect at least 100 ml for individual sample aliquot.*

3. What is the notification requirement for Industrial Users that become aware of discharge violations?

*Ans: Industrial Users are required to report discharge violations to IMPP within 24-hours of becoming aware of such violations.*

4. What is the sampling requirement for Industrial Users that become aware of discharge violations?

*Ans: The Industrial User shall repeat the sampling and analysis and submit the results of the repeat Analysis into our office within 30 days of becoming aware of the violation. [40 CFR 403.12(g)(2)]*

5. What is the minimum pH limit for Industrial Users that discharge into the City of Memphis POTW?

*Ans: 5.5 S.U. is the minimum pH limit for Industrial Users discharges to the POTW.*

Please send any questions that you may have to Derrick Porter; [derrick.porter@memphistn.gov](mailto:derrick.porter@memphistn.gov).